

**BERRY LAW PLLC**  
745 FIFTH AVENUE, 5<sup>th</sup> Floor  
NEW YORK, NEW YORK 10151  
Phone (212) 355-0777  
Fax (212) 750-1371

**MEMO ENDORSED**

Eric W. Berry (NY)  
e-mail [BerryLawPllc@gmail.com](mailto:BerryLawPllc@gmail.com)

February 12, 2021

Hon. Denise L. Cote, U.S.D.J. (via ECF)  
Senator Daniel P. Moynihan Federal Courthouse  
500 Pearl Street, Courtroom 15B  
New York, New York 10007

**Letter Motion to Seal the Knopfs' Motion  
for a Protective Order pursuant to Rule 26(c)(1)(A)**

Your Honor:

The Knopfs request an order that the Court seal the un-redacted version of their Motion for a Protective Order forbidding discovery of certain materials demanded by the Dorsey Defendants and subpoenaed from a non-party by defendant Frank Esposito. The Knopfs believe that the requested sealing order and redaction is necessary to “preserve the integrity of a government investigation and law enforcement interests. . . [.]” *In re Applications to Unseal 98 CR 1101(ILG)*, 568 Fed.Appx. 68, 70 (2d Cir. 2014).


For the above reasons, the Knopfs respectfully request that the Court grant their application to redact and concurrently file under seal their Motion for a Protective Order.

Respectfully submitted,

/s/ Eric W. Berry  
Eric W. Berry

cc: all counsel and *pro se* parties (by the ECF system);  
counsel for the subpoenaed non-party (by email)

The proposed redactions are approved.  
2.12.21

  
\_\_\_\_\_  
DENISE COTE  
United States District Judge